

**Application No: 09/497,773**

## **REMARKS/ARGUMENTS**

With respect to paragraphs under the heading Amendment, Applicants appreciate the Examiner's consideration and entry of the Amendment.

With respect to the claim rejections under 35 USC § 112, Applicants have cancelled claims 26-28, 31-33, and 39-41. However, Applicants respectfully disagree with the assertion that the claims are indefinite.

With respect to the claim rejections under 35 USC § 103(a), the Office Action relies on Wolff (US Patent 6,247,047) in view of Boyle et al (US Patent 6,138,158). The action states that Wolff describes embedding within banner 102 a URL of host server 12 and a unique indicia identifying the product or service being advertised. Wolff is described as disclosing that the indicia is appended to the end of the URL and the URL is linked to the banner 102. The action states that the banner for a second product or service can optionally be cascaded or nested with the first banner depending upon the contents of the retrieved record.

The Office Action further relies on Boyle et al, stating that Boyle teaches a means for labeling URLs using descriptive words in combination with an arbitrary base word in order to provide a more organized and easier to understand network of URLs. The rejection states that it would have been obvious to one ordinary skilled in the art, at the time the invention was made, to modify unique numerical indicia of Wolff to incorporate the descriptive words of Boyle et al in order to provide a more organized and easier to understand network of URLs.

However, the independent claims clearly cite a domain name, not a URL. A domain name is defined by Whatis.com as follows:

A domain name locates an organization or other entity on the Internet. For example, the domain name [www.totalbaseball.com](http://www.totalbaseball.com) locates an Internet address for "totalbaseball.com" at Internet point 199.0.0.2 and a particular host server named "www". The "com" part of the domain name reflects the purpose of the organization or entity (in this example,

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"commercial") and is called the top-level domain name. The "totalbaseball" part of the domain name defines the organization or entity and together with the top-level is called the second-level domain name. The second-level domain name maps to and can be thought of as the "readable" version of the Internet address.

A URL or Universal Resource Locator is defined by Whatis.com as follows:

A URL (Uniform Resource Locator, previously Universal Resource Locator) is the address of a file (resource) accessible on the Internet. The type of file or resource depends on the Internet application protocol. Using the World Wide Web's protocol, the Hypertext Transfer Protocol (HTTP), the resource can be an HTML page, an image file, a program such as a common gateway interface application or Java applet, or any other file supported by HTTP. The URL contains the name of the protocol required to access the resource, a domain name that identifies a specific computer on the Internet, and a pathname (hierarchical description of a file location) on the computer.

On the Web (which uses the Hypertext Transfer Protocol), an example of a URL is: <http://www.ietf.org/rfc/rfc2396.txt> which describes a Web page to be accessed with an HTTP (Web browser) application that is located on a computer named www.ietf.org. The pathname for the specific file in that computer is /rfc/rfc2396.txt.

An HTTP URL can be [defined] for any Web page, not just a home page, or any individual file.

A URL for a program such as a forms-handling common gateway interface script written in Perl might look like this:

<http://whatis.com/cgi-bin/comments.pl>

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A URL for a file meant to be downloaded [may specify] ... the "ftp" protocol ... like this one:

`ftp://www.somecompany.com/whitepapers/widgets.ps`

A URL is a type of URI (Uniform Resource Identifier, formerly called Universal Resource Identifier.)

The combination of Wolff and Boyle provides a URL. This URL is clearly not a domain name and in no way can be construed as a domain name. In fact, the examples of Wolff and Boyle depict an unchanging domain name in each of their respective URL examples.

Applicants have amended independent claims 16, 17, 19, and 23. Applicants submit that each of the previously presented claims is in condition for allowance.

None of the cited references teach the specific combination as recited in claim 16. For example, none of the cited references teaches a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website *domain name*, where the first website domain name includes a first second-level domain name portion formed from a common name portion, a first product name portion, and a top-level domain portion, and where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes a second second-level domain name portion formed from the common name portion, a second product name portion, and the top-level domain portion, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teach that the second product

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offered via the second site is related to the first product offered via the first site. In contrast to claim 16, Wolff discloses banner having a URL.

Further, none of the cited references teach creating a website direct link between the first website (having a first product name and offering a first product) and the second website (having a second identifying product name and offering a second product). The Wolff reference describes providing links between the sponsor site and the host server 12, but not between different product offering sites where each product offering site has a product identifying portion with the respective website domain name. For at least the foregoing reasons, claim 16 is in condition for allowance.

None of the cited references disclose the specific combination as recited in claim 19. For example, none of the cited references disclose a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, where the first website domain name includes a first second-level domain name portion formed from a common name portion, a first product name portion, and a top-level domain portion, and where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes a second second-level domain name portion formed from the common name portion, a second product name portion, and the top-level domain portion, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teach that the second product offered via the second site is related to the first product offered via the first site. In contrast to claim 19, Wolff only discloses a banner link having a URL, not a domain name, and not the second website domain name as claimed.

Further, none of the cited references disclose establishing a third website having a third website domain name, where the third website domain name includes a third second-level

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domain name portion formed from the common name portion, a third product name portion, and the top-level domain portion, and where the third product name portion describes a third product of the plurality of interrelated products offered for sale via the third website. Further, the cited references fail to disclose that the third product is related to the first product and is related to the second product, and that the third website is separately accessible via the electronic communications network.

Further, none of the cited references teach that the first website includes a direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 19 is allowable over the cited references.

None of the cited references teach the specific combination as recited in claim 23. For example, none of the cited references teach a method of offering a plurality of interrelated services through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, where the first website domain name includes a first second-level domain name portion formed from a common name portion, a first service name portion, and a top-level domain portion, and where the first service name portion identifies a first service of the plurality of interrelated services identified via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes a second second-level domain name portion formed from the common name portion, a second service name portion, and the top-level domain portion, and where the second service name portion identifies a second service of the plurality of interrelated services identified via the second website. In addition, none of the cited references teaches that the second service offered via the second site is related to the first service offered via the first site. In contrast to claim 23, Wolff describes a banner having a URL.

Further, none of the cited references disclose establishing a third website having a third website domain name, where the third website domain name includes a third second-level

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domain name portion formed from the common name portion, a third service name portion, and the top-level domain portion, and where the third service name portion describes a third service of the plurality of interrelated services identified via the third website. Further, the cited references fail to disclose that the third service is related to the first service and is related to the second service, and that the third website is separately accessible via the electronic communications network.

Further, none of the cited references teach that the first website includes a direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 23 is also allowable over the cited references.

Claims 17-18, 20-22, 24-25, 29-30, and 34-38 depend from one of the independent claims referenced above. Since each of the independent claims are allowable, each of the dependent claims are likewise allowable.

In addition to the reasons for allowability presented above, Applicants have demonstrated commercial success and other secondary consideration. Furthermore, Applicants respectfully disagree that the previous arguments are not persuasive. Applicants respectfully reassert and maintain all arguments made in prior communications to the USPTO regarding this application.


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For at least the foregoing reasons, each of the pending claims 16-25, 29-30, and 34-38 are submitted to be in condition for allowance and allowance of the pending claims is respectfully requested.

In conclusion, Applicants have overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

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Date

  
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